

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

NEBULA GLASS INTERNATIONAL,
INC., d/b/a GLASSLAM N.G.I., INC.,
a Florida Corporation,
Plaintiff,

vs.

CASE No. 02-60703-CIV-DIMITROULEAS

REICHHOLD, INC.,
a foreign corporation,
Defendant.

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DEFENDANT REICHHOLD INC.'S PROPOSED VOIR DIRE

Defendant Reichhold, Inc., respectfully submits its Proposed Voir Dire, attached hereto.

HOLLAND & KNIGHT LLP



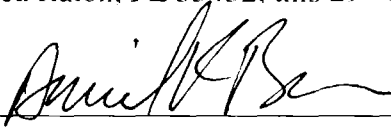
Fred J. Lotterhos III
(Trial Counsel)
Florida Bar No. 284610
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50 N. Laura Street, Suite 3900
Jacksonville, FL 32202
(904) 353-2000 [Telephone]
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Attorneys for Defendant
Reichhold, Inc.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by hand delivery to John D. Heffling, Esquire, Williams & Heffling, 316 Banyan Boulevard, P.O. Box 4118, West Palm Beach, FL 33402, and Kimberly Boldt, The Boldt Law Firm, Boca Plaza, Suite 203, 299 West Camino Gardens Boulevard, Boca Raton, FL 33432, this 29th day of April, 2004.



Attorney

UNITED STATES DISTRICT COURT
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NEBULA GLASS INTERNATIONAL,
INC., d/b/a GLASSLAM N.G.I., INC.,
a Florida Corporation,
Plaintiff,

vs.

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REICHHOLD, INC.,
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Defendant.

**DEFENDANT REICHHOLD, INC.'S
PROPOSED VOIR DIRE**

Defendant Reichhold, Inc. requests that the Court pose the following questions to the venire:

I. Introduction

- a. What is your name and age?
- b. Are you married?
- c. Do you see anyone on the panel sitting here that you know? Who? How do you know them? Would it affect your ability to serve as a juror if you were both on the jury?

II. Education

- a. What is your educational background?
- b. Where did you receive your high school and/or any further formal education?
- c. Do you have any vocational training? What kind?
- d. If you attended college, did you receive a degree?
- e. Have you earned any advanced degrees?

- f. Have you or anyone in your family ever studied law, accounting or engineering?
If so, explain.

III. Employment

- a. Are you currently employed? If so, by whom and in what capacity?
- b. If retired, what was your former occupation?
- c. If married, is your spouse employed? If yes, by whom and in what capacity?
- d. Has anyone ever worked for a lawyer or a law firm?
- e. Have you or a member of your family ever worked in the construction business or the business of glass manufacturing or the glass window installation business? If so, please explain.
- f. Do you have expertise with respect to resin or glass manufacturing?

IV. Children

- a. Do you have any children? If so, give their ages
- b. Are any of your children employed? If yes, in what positions and by whom are your children employed?

V. Parents

- a. What were/are your parents'/guardians' principal occupations?
- b. Describe your parents'/guardians' education.

VI. Residence

- a. Where do you live?
- b. How long have you lived there?
- c. Do you own your own home, rent, or live with others?

VII. Contacts with the Parties

- a. Reichhold, Inc. is the defendant in this case. Reichhold manufactures resin. Have you ever had any dealings with Reichhold? If so, please describe the circumstances.

- b. The plaintiff in this case is Nebula Glass International, Inc., d/b/a Glasslam N.G.I., Inc. Glasslam is a supplier of glass laminating resin and processes used by glass manufacturers to make laminated glass products. Have you ever had any dealings with Glasslam? If so, please describe the circumstances.
- c. This case involves alleged problems with laminated glass and laminated glass hurricane windows. Do you, your family and/or friends have hurricane windows in your homes?
- d. Do any of you possess preconceived opinions, one way or another, regarding corporations and lawsuits?
- e. Do you believe that there could be more than one way to make the same product and that both ways could yield a satisfactory product?

VIII. Witnesses

- a. The parties may call the following witnesses in this case:

[Read list from Pre-Trial Stipulation]:

Do you know any of these witnesses? If so, please explain.

- b. Polygard, Inc. is not a party to this case, but you will hear about Polygard during this case, and Polygard representatives may be witnesses in the case. Have you or anyone close to you had any personal or professional contact with Polygard? If so, please explain.
- c. United Glass Laminating is not a party to this case, but you will hear about United Glass Laminating during this case, and United Glass Laminating representatives may be witnesses in the case, particularly Carlos Rodriguez. Have you or anyone close to you had any personal or professional contact with United Glass Laminating? If so, please explain.
- d. Dependable Glass Works is not a party to this case, but you will hear about Dependable Glass Works during this case, and Dependable Glass Works representatives may be witnesses in the case. Have you or anyone close to you had any personal or professional contact with Dependable Glass Works? If so, please explain.
- e. Smith Mountain Impact Systems is not a party to this case, but you will hear about Smith Mountain Impact Systems during this case, and Smith Mountain Impact Systems representatives may be witnesses in the case. Have you or anyone close to you had any personal or professional contact with Smith Mountain Impact Systems? If so, please explain.

- f. Clearview Industries is not a party to this case, but you will hear about Clearview Industries during this case, and Clearview Industries representatives may be witnesses in the case. Have you or anyone close to you had any personal or professional contact with Clearview Industries? If so, please explain.
- g. 21st Century Hurricane Glass is not a party to this case, but you will hear about 21st Century Hurricane Glass during this case, and 21st Century Hurricane Glass representatives may be witnesses in the case, particularly Patrick Argento. Have you or anyone close to you had any personal or professional contact with 21st Century Hurricane Glass? If so, please explain.
- h. Ultimate Doors of Palm Beach is not a party to this case, but you will hear about Ultimate Doors of Palm Beach during this case, and Ultimate Doors of Palm Beach representatives may be witnesses in the case, particularly Roger Warwick. Have you or anyone close to you had any personal or professional contact with Ultimate Doors of Palm Beach? If so, please explain.
- i. Precision Glass Bending Corp. is not a party to this case, but you will hear about Precision Glass Bending Corp. during this case, and Precision Glass Bending Corp. representatives may be witnesses in the case. Have you or anyone close to you had any personal or professional contact with Precision Glass Bending Corp.? If so, please explain.
- j. Custom Glass is not a party to this case, but you will hear about Custom Glass during this case, and Custom Glass representatives may be witnesses in the case, particularly Victor Prieto. Have you or anyone close to you had any personal or professional contact with Custom Glass? If so, please explain.
- k. Beehive Glass is not a party to this case, but you will hear about Beehive Glass during this case, and Beehive Glass representatives may be witnesses in the case. Have you or anyone close to you had any personal or professional contact with Beehive Glass? If so, please explain.

IX. Litigation

- a. If you, a family member or friend has ever been in a lawsuit or been a witness in a lawsuit, please explain the type of suit, the involvement, the outcome of the suit, whether the experience was positive or negative and whether the result was satisfactory?
- b. If you, a family member or friend has ever served as a juror before, please explain the kind of case, whether the jury reached a verdict, and whether the experience was satisfactory?

- c. If you, a family member or friend has ever been a witness in a trial before, please explain the kind of case, the nature of the testimony, and whether the experience was satisfactory?

X. Counsel

- a. The attorneys for Reichhold in this case are Fred Lotterhos, Peter Hargatai, and Dan Bean, who work for Holland & Knight LLP. Are you related to them or to any person in their firm?
- b. Do you know any of them or anyone in their firm?
- c. The attorneys for Glasslam in this case are John D. Heffling, who works for Williams & Heffling, and Kimberly Boldt, who works for The Boldt Law Firm. Are you related to them or to any person in their firms?
- d. Do you know any of them or anyone in their firm?

XI. Jury Service

- a. Do you know of any reason why you could not sit as an impartial juror in this case? (time commitment, don't believe in the jury system, physical disabilities, hardships)
- b. Do you have any knowledge of or about this case before today? If so, what knowledge do you have? If so, how did you gain such knowledge?
- c. Will you base your decision solely upon the evidence and the law and not upon the sympathy or personal dislike of any of the parties?
- d. The parties are entitled to independent jurors. Each juror's opinion is important. No one person should dominate regardless of his or her job, education or age. Do you believe you can assert your own views?
- e. Is there any pressing business or personal situation that might cause you to want to hurry your deliberation in the jury room?
- f. Does anyone have a problem applying a preponderance of the evidence standard if asked to do so by the Court?

XII. Miscellaneous

- a. Do you have any problem seeing, hearing, or speaking English?
- b. Have any of you ever frequented the Pub that Glasslam's president, Steve Howes, owns in West Palm call The George and Dragon Pub?
- c. Is there anything you think we should know about your ability to serve as a juror, but have not asked?

Respectfully submitted,

HOLLAND & KNIGHT LLP



Fred J. Lotterhos III

(Trial Counsel)

Florida Bar No. 284610

Peter P. Hargatai

Florida Bar No. 085375

Daniel K. Bean

Florida Bar No. 0015539

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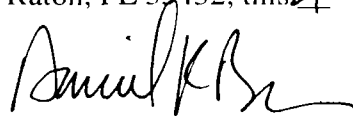
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